

LAW OFFICES OF SCOTT E. LEEMON, P.C.

41 Madison Avenue, 31st Floor

New York, New York 10010

(212) 696-9111--- Office

(917) 238-0880---Mobile

scott@leemonlaw.com

www.leemonlaw.com

August 23, 2022

Via ECF

Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 10/6/2022
--

Re: United States v Owen Drain, 20 CR 145 (VM)

Dear Judge Marrero:

I write with the consent of Leo Barrios (Pre-trial Service) and AUSA Ni Quan (who deferred to Pre-trial) to respectfully request that the defendant's bail conditions be amended to permit him, once his wife gives birth to their child, to move in with his wife to their pre-arrest apartment located at:

[REDACTED]

The defendant's wife, Ashley, will assume the role of third-party custodian and all other conditions of release will remain in effect. Mr. Barrios will be fully informed of the timing, once the baby is born.

I thank you in advance for your consideration.

Very truly yours

/s/

Scott E. Leemon

cc: All Counsel (via ECF)
Leo Barrios, USPTS (via email)

Request GRANTED.

The request for a modification of defendant's
bail conditions as described above is GRANTED.

SO ORDERED.

10/6/2022

DATE


VICTOR MARRERO, U.S.D.J.